

Exhibit CT103

Heather Cooley: Rebuttal Testimony
Prepared on behalf of CalTrout for
State Water Resources Control Board Cachuma Project
Hearing

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Pacific Institute
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Summary

- The FEIR overestimates future demand and potential shortages under the proposed alternatives.
- The FEIR does not include cost-effective urban conservation potential available to water contractors.
- The FEIR does not adequately consider the availability of water through alternative supplies.
- The FEIR does not consider the potential for reducing agricultural water use.

Point #1

- The FEIR overestimates future demand and potential shortages under the proposed alternatives.
 - Water demand projections used in the FEIR are based on outdated estimates and ignore more recent water demand projections supplied by the water contractors, including in their 2010 Urban Water Management Plans.
 - Demand projections in the FEIR fail to integrate mandated water conservation and efficiency improvements, particularly a requirement to reduce per capita demand by 20% by 2020.

Water Demand Projections

	2000	2020/2030 FEIR	Data Source/Notes
Carpinteria Valley Water District	4,300	4,600	2005 UWMP
Montecito Water District	6,073	6,500	<i>2030 demand based on projected demand w/increased rates and water conservation</i>
City of Santa Barbara	14,342	14,500	<i>City of Santa Barbara (2010 Preliminary values for Plan Santa Barbara [General Plan Update] DEIR</i>
Goleta Water District	14,000	15,890	2005 UWMP
Santa Ynez River Water Conservation District, ID#1	7,292	8,273	<i>Chris Dahlstorm, ID No. 1 General Manager, 2010; 2025 demand</i>
Total	46,007	49,763	

Water Demand Projections

	2000 Water Demand	2020/2030 Water Demand Projections		Source of Updated Estimates
		FEIR	Updated Estimates	
Carpinteria Valley Water District	4,300	4,600	4,212	2010 UWMP (p. 21); submitted July 29, 2011
Montecito Water District	6,073	6,500		
City of Santa Barbara	14,342	14,500	12,576	2010 UWMP (Table 6, p. 14); submitted July 15, 2011
Goleta Water District	14,000	15,890	13,267-14,675	2010 UWMP (p.2-9); submitted December 7, 2011
Santa Ynez River Water Conservation District, ID#1	7,292	8,273		
Total	46,007	49,763		

Water Demand Projections

	2000 Water Demand	2020/2030 Water Demand Projections		Source of Updated Estimates
		FEIR	Updated Estimates	
Carpinteria Valley Water District	4,300	4,600*	4,212	2010 UWMP (p. 21); submitted July 29, 2011
Montecito Water District	6,073	6,500	6,500	FEIR; UWMP has not been submitted yet; for 2030
City of Santa Barbara	14,342	14,500	12,576	2010 UWMP (Table 6, p. 14); submitted July 15, 2011
Goleta Water District	14,000	15,890*	13,267-14,675	2010 UWMP (p.2-9); submitted December 7, 2011
Santa Ynez River Water Conservation District, ID#1	7,292	8,273	8,273	FEIR; UWMP has not been submitted; for 2025
Total	46,007	49,763	44,828 – 46,236	

Point #2

- The FEIR does not include cost-effective urban conservation potential available to water contractors.
 - The FEIR improperly disregards that, at least, 5,000 to 7,000 acre-feet of water could be conserved by Cachuma contractors, cost-effectively.
 - Technological improvements since 2003 indicate that conservation potential could be ever larger.
 - The FEIR wrongly concludes that each of the water contractor's water rates provides a strong incentive to conserve.

Residential Water Rates, 2012

Municipality [Water Provider]	Rate Structure Type	Fixed Monthly Service Charge	Unit Rate per 1,000 Gallons of Water Consumed
Carpinteria Valley Water District	Increasing Block Rate (three blocks)	\$30.79	\$4.01 - avg. winter use (base) \$5.15 - base to 2xbase \$6.48 - over 2xbase
Montecito Water District	Increasing Block Rate (four blocks)	\$30.95	\$5.21 – up to 18,700 gal \$5.55 – 19,448 to 44,800 \$6.55 – 45,628 to 89,760 \$7.89 – over 90,508
Goleta Water District	Increasing Block Rate (two blocks)	\$10.68 - \$32.05	\$5.55 – up to 2,992 gal \$5.75 – over 2,992 gal
City of Santa Barbara	Increasing Block Rate (three blocks)	\$12.74 (5/8") \$19.15 (3/4")	\$4.05 - up to 2,992 gal \$6.78 - 2,993 to 14,960 gal \$7.14 - over 11,968 gal
Santa Ynez River Water Conservation District, ID#1	Uniform	\$31.00 (5/8") \$37.10 (3/4")	\$3.62

Point #3

- The FEIR does not adequately consider the availability of water through alternative supplies.
 - Recycled water, rainwater harvesting, and stormwater capture are additional sources of water supply that have not been implemented, or could be further implemented, to reduce or eliminate the need for Santa Ynez River water.

Recycled Water

	Recycled Water- Normal Year (AFY)	Total Supply - Normal Year (AFY)	Supply from Recycled Water (%)	Recycled Water Capacity (AFY)
Carpinteria Valley Water District	0	5,699	0%	0
Montecito Water District	0	7,305	0%	0
City of Santa Barbara	800	17,493	5%	1,100
Goleta Water District	1,000	16,471	6%	3,000
Santa Ynez River Water Conservation District, ID#1	0	7,241	0%	0
Total	1,800	54,209	3%	1,860

Point #4

- The FEIR does not consider the potential for reducing agricultural water use.
 - A 2009 Pacific Institute analysis estimates that there are a variety of technologies and practices that can reduce water requirements for agriculture.
 - Recycled water can also be used to meet agricultural water demand.

Agricultural Water Demand

	Agricultural Water Demand (AFY)	Year of Estimate	Data Source
City of Santa Barbara	106	2010	p. 16, 2010 UWMP
Goleta Water District	2,387	2010	p. 2-3, 2010 UWMP
Carpinteria Valley Water District	1,582	2010	p. 18, 2010 UWMP
Montecito Water District	550	2005	p. 28, 2005 UWMP
Santa Ynez River Water Conservation District, ID#1	2,848	2000	p. 7-2, 2000 UWMP
Total	7,473		

Conclusions

- The FEIR overestimates future demand and potential shortages under the proposed alternatives.
- The FEIR does not include cost-effective urban conservation potential available to water contractors.
- The FEIR does not adequately consider the availability of water through alternative supplies.
- The FEIR does not consider the potential for reducing agricultural water use.



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